

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA

SAVANNAH DIVISION

UNITED STATES OF AMERICA	:	
	:	CRIMINAL CASE
v	:	
	:	No. 4:18-CR-274 (LGW)(BWC)
PABLO RANGEL-RUBIO	:	
JUAN RANGEL-RUBIO	:	
HIGNINO PEREZ-BRAVO	:	
_____	:	

JOINT MOTION TO PRODUCE

Comes now, Defendants, PABLO RANGEL-RUBIO, JUAN RANGEL-RUBIO and HIGNINO PEREZ-BRAVO, by and through undersigned counsel and move this Court to direct the government to produce the following discovery. In support of this motion, the Defendants show as follows:

(1)

The indictments charge the Defendants with various offenses including with conspiracy to harbor aliens, conspiracy to commit money laundering; substantive counts of money laundering; conspiracy to kill a witness; conspiracy to intimidate a witness; and conspiracy to commit murder for hire.¹

¹ Pablo is named in all counts. Juan is named in the conspiracy to harbor aliens, conspiracy to launder money, conspiracy to kill a witness and conspiracy to retaliate against a witness. Mr. Perez-Bravo is named only in the murder for hire conspiracy.

(2)

Over the course of this case the government has made seven different discovery disclosures which included tens of thousands of pages of documents and hundreds of hours of audio recordings.

(3)

From counsel's review of the discovery provided thus far, it appears there are items missing that should have been produced including:

- 1) 12/27/17 audio recording of interview of Juan Ramirez;
- 2) 1/10/18 audio recording of interview of Joel Reyes;
- 3) 1/22/18 audio recording of interview of Raymundo Espino-Vega;
- 4) 1/22/18 audio recording of interview of Gerardo Hernandez-Andrade;
- 5) 1/26/18 audio recording of interview of Juanita Nunez;
- 6) 2/2/18 audio recording of interview of Sunilda Brito;
- 7) 2/7/18 audio recording of interview of Sunilda Brito;
- 8) 4/26/18 audio recording of interview of Ricardo Ramirez;
- 9) 5/1/18 audio recording of interview of Ruben Ramirez-Hernandez;
- 10) 5/7/18 audio recording of interview of Lecornus Jones;
- 11) audio recording of interview of Artemio Espino;
- 12) audio recording of interview with Hipolito Martinez;
- 13) contents of Eliud Montoya's computer;
- 14) reports pertaining to any interviews of Griselda Montoya (discovery indicates there were 4-5 contacts with law enforcement);
- 15) report, summary and CV for cell site location expert;
- 16) reports pertaining to law enforcements contacts (4 times) with Maria Montoya;
- 17) report of interview with Juan LNU who came to Maria Montoya with information about another person who did not report to work after Eliud Montoya was killed;

- 18) all text messages between Detective Rodriguez and Maria Montoya, Griselda Montoya or any other witnesses;
- 19) bank account records for Eliud Montoya (discovery mentions at least 3 accounts);
- 20) bank account records of Juan Ramierez;
- 21) report of interview between HSI and Enner Tello Lopez;
- 22) reports of Garden City police meetings with Raymundo Espino;
- 23) report of interview with Angel Rodriguez.

(4)

Counsel for the Defendants have a good faith belief these documents/records exist (the recordings are specifically referenced in the HSI reports produced in discovery by the government) and are in the possession of the prosecution team.

(5)

The Defendants need access to the above-listed items so that they may conduct investigation and/or prepare for any pre-trial hearings this Court may schedule.

WHEREFORE, the Defendants request that this Court direct the government to produce the above-listed items and any other matters that should have been produced pursuant to F.R.Cr.P 12.4 & 16.

Dated, this the 21st day of October, 2020.

Respectfully submitted,

/s/ Jeffrey L. Ertel
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served all the parties in the above-captioned case in accordance with the directives from the Court Notice of Electronic Filing which was generated as a result of electronic filing.

Dated, this the 21st day of October, 2020.

/s/Jeffrey L. Ertel